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Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR 12-00799 YGR
	)	
v.	)	
	)	STIPULATED REQUEST TO CONTINUE
	)	STATUS HEARING TO JUNE 27, 2013
DANIEL RAMOS,	)	
	)	
	)	Date: June 6, 2013
Defendant.	)	Time: 2:00 p.m.
	)	Court: Hon. Yvonne Gonzalez Rogers
_____	)	

The above-captioned matter is set on June 6, 2013 at 2:00 p.m. before this Court for a status hearing. Defense counsel Ned Smock recently learned that the Federal Public Defender's Office had a conflict in the instant case, and, on May 14, 2013, Mr. Smock was relieved from representing the defendant and replaced by new counsel, Laurel Headley. On that same date, counsel for the government and Ms. Headley spoke over the telephone to ensure that Ms. Headley would have all of the discovery which consists of numerous reports, audio and video recordings, photographs, and other items. The parties now request that the status hearing

1 previously scheduled for June 6, 2013 be continued to June 27, 2013 in order to give new  
2 defense counsel sufficient time to review all of the discovery in this case for which she was just  
3 recently appointed. This is the first request for a continuance since Ms. Headley was appointed  
4 to represent the defendant.

5 The Court has previously excluded the running of the speedy trial clock for effective  
6 preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv), through June 6, 2013. Therefore, the  
7 parties now request that the time between June 6, 2013 and June 27, 2013 be excluded from the  
8 running of the speedy trial clock for that same reason – effective preparation of counsel, 18  
9 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into account the public interest in  
10 prompt disposition of criminal cases, good cause exists for this continuance, especially in light of  
11 the fact that new defense counsel was just recently appointed. The parties also agree that the  
12 ends of justice served by granting such a continuance outweigh the best interests of the public  
13 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

14  
15 SO STIPULATED:

MELINDA HAAG  
United States Attorney

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18 DATED: May 20, 2013

\_\_\_\_\_  
/s/  
NATALIE LEE  
Assistant United States Attorney

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20 DATED: May 20, 2013

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/s/  
LAUREL L. HEADLEY  
Attorney for Daniel Ramos

1 For the reasons stated above, the status hearing in this matter is continued until June 27,  
2 2013. The Court finds that the exclusion of time from June 6, 2013 through June 27, 2013 is  
3 warranted and that the ends of justice served by the continuance outweigh the best interests of  
4 the public and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A). The failure to grant  
5 the requested continuance would deny the defendant effective preparation of counsel. 18 U.S.C.  
6 § 3161(h)(7)(B)(iv).

7 SO ORDERED.

8  
9 DATED: May 24, 2013

  
HONORABLE YVONNE GONZALEZ ROGERS  
United States District Judge